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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
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13 JUNIPER NETWORKS, INC.

14 Plaintiff,

15 v.

16 SWARM TECHNOLOGY LLC,

17 Defendant.  
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Case No. 5:20-cv-03137-JD

**DECLARATION OF ALFONSO INIGUEZ IN  
SUPPORT OF SWARM TECHNOLOGY  
LLC'S MOTION TO DISMISS FOR NO  
CASE OR CONTROVERSY, LACK OF  
PERSONAL JURISDICTION AND  
IMPROPER VENUE AND MEMORANDUM  
OF POINTS AND AUTHORITY**

Date: August 20, 2020  
Time: 10:00 a.m.  
Location: Courtroom 11  
Judge: Hon. James Donato



1 I, Alfonso Iniguez, hereby declare and state under penalty of perjury as follows:

2 1. I am over the age of eighteen. I am the founder of Swarm Technology LLC  
3 and the named inventor on U.S. Pat. No. 9,146,777; 9,852,004; and 10,592,275. My  
4 declaration is made on my personal knowledge and were I called to testify, I would testify  
5 truthfully and competently to the matters set forth in my declaration.

6 2. I formed Swarm Technology LLC on January 17, 2014 as an Arizona based  
7 limited liability corporation. Swarm is based in Mesa, Arizona.

8 3. Swarm is a start up company that is working to develop a new multiprocessor  
9 architecture. Swarm is actively developing its technology including in robots. To fund  
10 Swarm's operations, I decided to license Swarm's patents.

11 4. Swarm has attended three trade shows in Santa Clara, California. On May  
12 16-18, 2017, I attended the Internet of Things World to exhibit Swarm's initial proof of  
13 concept prototype. On November 29-30, 2017, I attended IoT Tech Expo North America  
14 2017 to exhibit Swarm's cloud-connected swarm-intelligent robot. On May 14-17, 2018, I  
15 attended the Internet of Things World 2018 to exhibit Swarm's second-generation swarm-  
16 intelligent robots.

17 5. During the trade shows, I demonstrated our technology and robots and  
18 explained how our system work as commercial activity. I never accused any person or  
19 company of infringing Swarm's patents. I never had any discussions with any person or  
20 company about the validity of Swarm's patents. All discussions were focused on how  
21 Swarm's invention worked. No licensing activity took place while I was at the trade shows.

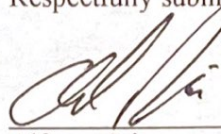
22 I declare under the penalty of perjury under the laws of the United State of America  
23 that the foregoing is true and correct.

24 Executed this 14th day of July 2020 in Chandler, Arizona.



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Respectfully submitted,



Alfonso Iniguez